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Attorneys for Wiegel Tool Works, Inc.

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

DPH Holdings Corp., et al.,

Reorganized Debtors.

Chapter 11 Case No. 05-44481 (RDD) Jointly Administered

NOTICE OF MOTION BY WIEGEL TOOL WORKS, INC. FOR RELIEF FROM THE PLAN MODIFICATION ORDER PURSUANT TO FED. R. CIV. P. 60(b) AND FED R. BANKR. P. 9024

PLEASE TAKE NOTICE that upon the accompanying motion (the "Motion") and all other pleadings and proceeding herein, Wiegel Tool Works, Inc. ("Wiegel"), by its undersigned counsel, shall move this Court before the Honorable Robert D. Drain, United States Bankruptcy Judge, United States Bankruptcy Court, 300 Quarropas Street, White Plains, New York 10601, on September 14, 2010, at 10:00 a.m.(Prevailing Eastern Time) or such other date and time as soon thereafter as the Court may direct, for an Order providing relief from the Plan Modification Order pursuant to Fed. R. Civ. P. 60 and Fed. R. Bankr. P. 9024.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, in opposition to the relief request shall be filed with the Court and served upon the undersigned counsel for Wiegel no later than September 7, 2010, at 4:00 p.m. (Prevailing Eastern Time) (the "Objection Deadline").

Dated: New York, New York July 30, 2010

KLESTADT & WINTERS, LLP

By: /s/Patrick J. Orr
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